



February 2, 2006

Gerald Thompson
Environmental Assistant
Alaskan Copper Works
P.O. Box 3546
Seattle, Washington 98124-3546

Dear Mr. Thompson:

In accordance with the requirements of the Washington State Department of Ecology, World Resources Company (WRC) is happy to provide you with the following information needed to determine the exact amount of Alaskan Copper Works material recycled by WRC during the 2005 calendar year.

WRC is aware that the State of Washington requires a copy of the recycling credit documentation. In the past, Ms. Holly Sullivan at the Department of Ecology has been receptive to a copy of this letter as sufficient proof of recycling credit documentation.

The following information is provided for use in your submittal:

Total Wet Tons Received:	33.27
Average Percent Solids:	87.86
Total Dry Tons:	29.13

Total Percentage Recycled: 100% less 12.14% moisture

After consultation with WRC corporate, technical, and legal personnel, it appears that the Form Code of W501 (if lime or hydroxide is used to precipitate your metals) or W519 (other inorganic sludges) might be appropriate choices to be used in preparing your submission. These codes are from the Washington Department of Ecology Book 2 Guidebook and Codes. Additionally, the Management Method Code of H010 (metals recovery including retorting, smelting, etc.) would be applicable to WRC's recycling process. WRC expands on the H010 description with "thermal concentration and compounding to produce metal concentrate products via an industrial process," which best describes WRC's recyclable material management.

Please be advised that in accordance with 40 CFR 262.11, the ultimate decision as to the classification of the hazardous waste (e.g., the Form Code) rests with the generator. The views expressed by WRC herein, should not be considered as legal advice or substituted for the more accurate generator's technical knowledge or laboratory analysis of the recyclable material and the generation process used.

If you have any questions regarding this information, please contact me at (602) 233-9166, ext. 303.

Sincerely,

WORLD RESOURCES COMPANY

Charlie Gish
Director of Marketing & Business Development



ACORD CERTIFICATE OF LIABILITY INSURANCEDATE (MM/DD/YYYY)
1/20/2006

PRODUCER FAX (703) 471-0938

Cushman Insurance Agency, Inc.

P.O. Box 1069

Herndon, VA 20172

Douglas Cushman

INSURED

WORLD RESOURCES COMPANY

1600 ANDERSON ROAD

MCLEAN

VA 22102

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE

NAIC #

INSURER A: Continental Casualty Co

INSURER B: Valley Vorge

INSURER C: Federal Insurance Company

INSURER D: Commerce & Industry Ins.

INSURER E: Chubb Custom Insurance

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR	ADD'L	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
LTR	INSRD					
A		GENERAL LIABILITY	2075845509	02/01/2006	02/01/2007	EACH OCCURRENCE \$ 1,000,000
	<input checked="" type="checkbox"/>	COMMERCIAL GENERAL LIABILITY				DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000
	<input type="checkbox"/>	CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person) \$ 5,000
						PERSONAL & ADV INJURY \$ 1,000,000
						GENERAL AGGREGATE \$ 2,000,000
		GEN'L AGGREGATE LIMIT APPLIES PER:				PRODUCTS - COMP/OP AGG \$ 2,000,000
	<input type="checkbox"/>	POLICY				
	<input type="checkbox"/>	PRO-JECT				
	<input type="checkbox"/>	LOC				
B		AUTOMOBILE LIABILITY	2075845512	02/01/2006	02/01/2007	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	<input checked="" type="checkbox"/>	ANY AUTO				BODILY INJURY (Per person) \$
	<input type="checkbox"/>	ALL OWNED AUTOS				BODILY INJURY (Per accident) \$
	<input type="checkbox"/>	SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident) \$
	<input type="checkbox"/>	HIRED AUTOS				
	<input type="checkbox"/>	NON-OWNED AUTOS				
	<input checked="" type="checkbox"/>	MCS-90 Endorsement				
		GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT \$
	<input type="checkbox"/>	ANY AUTO				OTHER THAN EA ACC \$
						AUTO ONLY: AGG \$
C		EXCESS/UMBRELLA LIABILITY	79727031BAL	02/01/2006	02/01/2007	EACH OCCURRENCE \$ 10,000,000
	<input checked="" type="checkbox"/>	OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE \$ 10,000,000
						\$
	<input type="checkbox"/>	DEDUCTIBLE				\$
		RETENTION \$				\$
D		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	WC 968-45-89	02/01/2006	02/01/2007	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER
		ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?				E.L. EACH ACCIDENT \$ 500,000
		If yes, describe under SPECIAL PROVISIONS below				E.L. DISEASE - EA EMPLOYEE \$ 500,000
						E.L. DISEASE - POLICY LIMIT \$ 500,000
C		OTHER POLLUTION LIABILITY	37250705WTO	02/01/2004	02/01/2007	\$10,000,000 / \$40,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

Certificate holder is named as additional insured as their interest may appear.

CERTIFICATE HOLDER

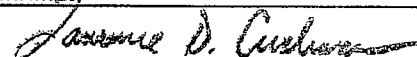
ALASKAN COPPER AND BRASS
CO. - Mr. Gerald Thompson
P. O. Box 3546
SEATTLE, WA 98124-3546

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES

AUTHORIZED REPRESENTATIVE

Lawrence Cushman



ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

1/20/2006

PRODUCER FAX (703) 471-0938

Cushman Insurance Agency, Inc.

P.O. Box 1069

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INSR ADD'L LTR INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	2075845509	02/01/2006	02/01/2007	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COM/OP AGG \$ 2,000,000
B	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90 Endorsement	2075845512	02/01/2006	02/01/2007	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY: AGG \$
C	EXCESS/UMBRELLA LIABILITY <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE DEDUCTIBLE RETENTION \$	79727031BAL	02/01/2006	02/01/2007	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000 \$ \$ \$
D	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	WC 968-45-89	02/01/2006	02/01/2007	<input checked="" type="checkbox"/> WC STATU-TORY LIMITS <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 500,000 E.L. DISEASE - EA EMPLOYEE \$ 500,000 E.L. DISEASE - POLICY LIMIT \$ 500,000
C	OTHER POLLUTION LIABILITY	37250705WTO	02/01/2004	02/01/2007	\$10,000,000 / \$40,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

Certificate holder is named as additional insured as their interest may appear.

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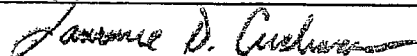
ALASKAN COPPER WORKS
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AUTHORIZED REPRESENTATIVE

Lawrence Cushman



Waste Received Summary

Reportable Waste Only

Generator 1024 ALASKAN COPPER WORKS
 Site Address 628 S HANFORD
 SEATTLE, WA 98134
 Epa Id WAD980738546

Customer 1024 ALASKAN COPPER WORKS
 Billing Address 628 SOUTH HANFORD
 PO BOX 3546
 SEATTLE, WA 98134-0000

Profile # 351069-00 Name of Waste REVENTMENT SLUDGE Form W519
 DW / EHW DW Source G13
 EPA Codes F006 Origin 1
 StateCodes Sp Grav 1.05

Manifests Received at TSDF BURLINGTON ENVIRONMENTAL, INC. - KENT FACILITY
 EPA Id WAD991281767

Initial System Code H141
 Final System Code H132

Received	Manifest #	Receipt #	Pounds	Recycle %
01/14/2006	55317-06 1A	KNT-9159B	5,254.20	

Profile # 358293-00 Name of Waste X-RAY COOLANT Form W204
 DW / EHW DW Source G19
 EPA Codes D001 Origin 1
 StateCodes Sp Grav 1.0

Manifests Received at TSDF BURLINGTON ENVIRONMENTAL, INC. - KENT FACILITY
 EPA Id WAD991281767

Initial System Code H141
 Final System Code H061

Received	Manifest #	Receipt #	Pounds	Recycle %
07/31/2006	81535-06 1A	KNT-0398D	458.70	

Profile # 358341-00 Name of Waste PAINT AND INK SOLVENT WITH HYDRAULIC OIL Form W205
 DW / EHW EHW Source G01
 EPA Codes Origin 1
 StateCodes WT01 Sp Grav 0.9

Manifests Received at TSDF BURLINGTON ENVIRONMENTAL, INC. - KENT FACILITY
 EPA Id WAD991281767

Initial System Code H141
 Final System Code H061

Received	Manifest #	Receipt #	Pounds	Recycle %
07/31/2006	81535-06 1D	KNT-0398D	400.00	

Profile # 362986-00 Name of Waste TANK CLEANING RINSATE WITH NITRIC ACID & AMMONIUM BIFLUORIDE Form W113
 DW / EHW DW Source G02
 EPA Codes D002 D004 D007 D008 Origin 1
 StateCodes Sp Grav 1.0

Manifests Received at TSDF BURLINGTON ENVIRONMENTAL, INC. - TACOMA PLANT
 EPA Id WAD020257945

Initial System Code H141
 Final System Code H132

Received	Manifest #	Receipt #	Pounds	Recycle %
12/19/2006	001356653JJK 1	TAC-63051	33,543.48	

Profile # IWS2.1-02 Name of Waste AEROSOLS CONSOLIDATION Form W801
 DW / EHW DW Source G09
 EPA Codes D001 Origin 2
 StateCodes Sp Grav 0.5

Manifests Received at TSDF BURLINGTON ENVIRONMENTAL, INC. - KENT FACILITY
 EPA Id WAD991281767

Initial System Code H141
 Final System Code H061

Received	Manifest #	Receipt #	Pounds	Recycle %
03/07/2006	60935-06 1B	KNT-1792C	5.00	

Waste Received Summary

Reportable Waste Only

Generator 1024 ALASKAN COPPER WORKS
Site Address 628 S HANFORD

Customer 1024 ALASKAN COPPER WORKS
Billing Address 628 SOUTH HANFORD
PO BOX 3546
SEATTLE, WA 98134-0000

Epa Id SEATTLE, WA 98134
WAD980738546

Profile # IWS3-02 Name of Waste FLAMMABLE LIQUIDS CLASS 3
DW / EHW DW
EPA Codes D001
StateCodes WL02

Form W001
Source G11
Origin 2
Sp Grav 1.1

Manifests Received at TSDf BURLINGTON ENVIRONMENTAL, INC. - KENT FACILITY
EPA Id WAD991281767

Initial System Code H061
Final System Code H050

Received	Manifest #	Receipt #	Pounds	Recycle %
03/07/2006	60935-06 1A	KNT-1792C	150.00	

** Generator Waste Stream Total 39,811.38 lbs



January 22, 2007

Dear Valued Customer:

RE: Annual Report Documentation

Enclosed is your *Waste Report Summary* for waste received by Burlington Environmental, Inc., a wholly owned subsidiary of Philip Services Corporation, (PSC), treatment facilities during 2006. PSC has tailored the 2006 Report to follow the reporting requirements of the Washington Department of Ecology (WDOE). Please note that only waste regulated by the State of Washington or Federal government will be listed on this report.

While reviewing your report, please check the following:

1. The company name is spelled correctly.
2. The address as printed, (including the zip code) is the SITE address where the waste was generated, not the company mailing address.
3. The 12 digit EPA ID# is correct.
4. Manifest numbers are correct.
5. All hazardous waste shipments to PSC are accounted for.
6. Weights are accurate to within 10% of your calculations.

The *Waste Report Summary* is generator site specific, broken down by profile number, and then by manifest number. The receiving facility is named, total weight shipped is shown, and all applicable recycling percentages are given for each waste stream we received. System and form codes have been included in this report. These codes identify your waste and its disposition. Please review these entries for accuracy. The report format should be easy to reference. However, if you need assistance in reviewing this report, please call your Customer Service Representative @ 800-228-7872 and they will be glad to help you.

I would like to take this opportunity to thank you for your continued business. PSC continually strives to be the leader in hazardous waste management.

Sincerely,

Kellie R. Vigil
General Manager
Pacific Northwest Region





January 09, 2007

Dear Valued Customer:

Re: Recycling Credits

Please find below a listing of waste streams that Philip Services recycled in the calendar year 2006. A brief description of the waste is given and then a recycling percentage is noted. Please review the *Waste Summary Report* that was recently mailed to you. In it you will find the recycling percentage for each individual waste shipment that is eligible for credit. Please note that the recycling percentage is based on the treatment process assigned to your waste upon receipt at one of our treatment, storage, and disposal facilities.

<u>Waste Description</u>	<u>Percentages</u>
Zinc Carbon batteries	50%
Lead-Acid batteries	85%
Lithium batteries	30%
Mercury batteries	70%
NiCad batteries	90%
Fluorescent light tubes (crushed)	86%
Fluorescent light tubes (whole)	86%
Metallic mercury	99%
Mercury compounds	10%
Mercury-containing equipment	60%
Mercury Vapor & HID Lamps	86%
Ballasts for recycling	80%
Solvent for recycle	72%
Chromic acid	5%
Inorganic metals	30%
Solids with copper	35%
Solids with Nickel	35%
Electroless Nickel Solutions	5%
Zinc Alkaline batteries	70%
Tin or Lead Solder	100%

If you have specific questions in response to the Recycling Percentage list, or your *Waste Summary Report*, please contact your Customer Service Representative and they will be happy to assist you.

Thank you again for your continued patronage. Philip strives to be the industry leader in hazardous waste management.

Sincerely,

Mike Uhlendorf
Materials Manager

18000 72nd Avenue S., Suite 217, Kent WA 98032
Phone (425) 227-0311, FAX (425) 204-7164

AKC-0016638